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Attorneys for Defendants Candina Heath
and Robert Smith

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

KEVIN GALLAGHER, on behalf of himself;)
and DONOR NO. 1, individually and on behalf) C 17-0586 MEJ
of all anonymous donors to Free Barrett Brown.)

Plaintiffs, } **STIPULATION: [PROPOSED] ORDER**

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UNITED STATES; CANDINA HEATH;
ROBERT SMITH: DOES 1-10

Defendants.

Subject to the Court's approval, Plaintiffs and Defendants, through their undersigned counsel of record, HEREBY STIPULATE as follows:

1. Plaintiffs filed their Complaint on February 6, 2017.

2. Defendants intend to file two motions to dismiss, one filed on behalf of Defendants Candina Heath and Robert Smith, sued here in their individual capacities; and one filed on behalf of Defendant United States.

3. Having conferred over their respective schedules, the parties stipulate to, and request, the following briefing schedule:

May 11, 2017 Defendants' Motions to Dismiss

July 6, 2017 Plaintiffs' Oppositions to Defendants' Motions to Dismiss

July 20, 2017 Defendants' Replies in Support of their Motions to Dismiss.

4. Defendants intend to notice the motions to dismiss for August 3, 2017.

5. The parties further stipulate to, and request, the following extension on the page limitations for the briefing on the motion filed on behalf of Defendant United States:

An additional 15 pages Defendant United States' Motion to Dismiss

An additional 15 Pages Plaintiffs' Opposition to Defendant United States' Motion to Dismiss

An additional 5 Pages Defendant United States' Reply in Support of its Motion to Dismiss.

6. In support of the stipulation for additional pages, Defendant United States states that it intends to assert multiple jurisdictional defenses, the number and complexity of which warrant additional pages.

IT IS SO STIPULATED.

Respectfully submitted,

Date: April 3, 2017

/s/
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Attorney for Defendants Candina Heath and Robert Smith

1 Date: April 3, 2017

/s/
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7 Date: April 3, 2017

/s/
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19 Attorneys for the United States of America

20 Date: April 3, 2017

/s/
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21 Attorney for Plaintiffs

1 **ATTESTATION**

2 Pursuant to Local Rule 5-1(i)(3), I certify that the content of this document is acceptable to
3 counsel for the Plaintiffs and counsel for Defendant United States and that I have obtained authorization
4 from Eric DiJulio, Samuel Singer, and Stephen Handler to affix their electronic signatures to this
5 document.

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7 DATED: April 3, 2017

Respectfully submitted,

8 /s/
9 SIEGMUND F. FUCHS
10 Attorney for Defendants Candina Heath
11 and Robert Smith

12 **[PROPOSED] ORDER**

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14 Pursuant to stipulation, IT IS SO ORDERED.

15 Date:

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17 MARIA-ELENA JAMES
18 United States Magistrate Judge
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